UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of:

To photograph the unclothed body of TERRELL M. SHANKLE, more specifically, to photograph a tattoo of a lion with the lettering "Purepimpin."

Case No. 17-M-1243

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

To photograph the unclothed body of TERRELL M. SHANKLE, more specifically, to photograph a tattoo of a lion with the lettering "Purepimpin."

located in the Eastern District of Wisconsin, there is now concealed:

A tattoo with a lion with the lettering "Purepimpin."

The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: 18 U.S.C. Section 1591

The application is based on these facts: See attached affidavit.

☐ Delayed notice of _______ days (give exact ending date if more than 30 days: _______________) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[signature]
Applicant's signature

FBI Special Agent Heather Wright
Printed Name and Title

Sworn to before me and signed in my presence:

Date: 2/22/17

[signature]
Judge's signature

City and State: Milwaukee, Wisconsin

William E. Duffin, U.S. Magistrate Judge
Printed Name and Title

AFFIDAVIT

I, Heather Wright, being first duly sworn, hereby depose and state as follows:

A. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been employed by the FBI since July 2010. I am currently assigned to the Wisconsin Human Trafficking Task Force which investigates the illegal trafficking of persons both domestic and foreign for the purposes of labor and commercial sex acts. I gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies. Prior to my assignment with the Milwaukee Division of the FBI, I was employed both as a Programmer Analyst for web applications from September 1999 through March 2001 as well as an Automation Engineer from June 2003 through July 2010 within the Pharmaceutical manufacturing industry. I am the case agent in *United States v. Terrell Shankle*, Case No. 16-CR-07. Mr. Shankle is currently in custody, having been detained without bail.
2. The facts in this affidavit come from my personal observations, my training and experience and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
3. This affidavit in support of a search warrant relating to the body of TERRELL M. SHANKLE [hereinafter "SHANKLE"], also known as "RELLY' and "KING RELLY", date of birth August XX, 1977, for the purpose of taking photographs of tattoos including

a tattoo of a lion with the lettering "Purepimpin." The investigation has involved law enforcement officers from the FBI, the Milwaukee Police Department [hereinafter "MPD"], Wisconsin Department of Justice Division of Criminal Investigation [hereinafter "DCI"], Cook County Sheriff's Police Department [hereinafter "CCSPD"], Chicago Police Department [hereinafter "CPD"], Hoffman Estates Police Department [hereinafter "HEPD"], and the United States Attorney's Office.

B. CURRENT CHARGES

4. On February 17, 2016, a federal grand jury sitting in the Eastern District of Wisconsin handed down an eight-count Superseding Indictment charging TERRELL SHANKLE with one count of Conspiracy to Transport a Minor To Engage in Prostitution, in violation of 18 U.S.C. §§ 2423(a) and 2423(e); three counts of Sex Trafficking of a Child Through Force, Fraud, and Coercion, in violation of 18 U.S.C. § 1591; two counts of Sex Trafficking Through Force, Fraud, and Coercion, in violation of 18 U.S.C. § 1591; one count of Sex Trafficking of a Child, in violation of 18 U.S.C. § 1591; and one count of Use of a Firearm During a Crime of Violence, in violation of 18 U.S.C. § 924(c)(1)(A)(iii).

C. PROBABLE CAUSE

5. Affiant submits that there exists probable cause to believe that SHANKLE, by means of force, fraud, or coercion did force numerous juvenile and adult females to engage in prostitution; that SHANKLE also forced each of the females to give him the proceeds of the prostitution activities; that SHANKLE regularly used force and / or the threat of force and great bodily harm to each of the females if they did not comply with his commands

to engage in prostitution and to give the proceeds of the prostitution activities to SHANKLE; and, that the reason for the force or threat of force used against any female was done so in orders to further his criminal enterprise. Affiant also submits that there exists probable cause to believe that SHANKLE has a tattoo on his body with the lettering "Purepimpin." Affiant submits that such a tattoo supports the evidence regarding SHANKLE's sex-trafficking activities as further described in the following paragraphs of this affidavit. I believe this because:

6. On November 9, 2010, Sergeant William Leen of the Cook County Sheriff's Police Department learned that a juvenile female who was arrested for prostitution was in custody. The juvenile female (hereinafter referred to as "SD") was interviewed by Sgt. Leen as well as FBI Special Agent Carrie Landau. SD stated that she had traveled from Milwaukee to Chicago with JA and had been working as a prostitute both in Milwaukee as well as Chicago for JA. SD stated that SD and JA had traveled from Milwaukee to Chicago via the Greyhound bus. SD stated that SHANKLE picked up JA and SD from the bus station. SD stated that SHANKLE was driving a brown conversion van with Wisconsin license plates. Once SHANKLE learned that SD was underage, SHANKLE told JA to bring SD to Chicago and that "this little bitch gonna get you rich." SD stated that there were three females in the van with SHANKLE when he picked up SD and JA from the bus station. SD stated that a black female named CC, a white female named DIAMOND, and a mixed race female named Sugar were in the vehicle. SD stated that they all went to the Aloha Motel in Chicago and later SHANKLE's females were arrested. SD stated that SHANKLE would rent the hotel rooms for SD and JA. SD stated that SHANKLE would drive all the females to the track every night and that SHANKLE

would sit on a side street near the area that they were walking. SD stated that she gave her money to JA and that the other girls gave their money to SHANKLE. SD stated that when SD did an outcall date, JA would have to give some of the money that SD made to SHANKLE. SD stated that the Chicago Police had seized a laptop from the Aloha Motel that belonged to SHANKLE. SD stated that SHANKLE had purchased the laptop from a Cash and Go which was a store located across the street from the Aloha Motel.

7. On 11/10/2010, SD was again interviewed by SA Carrie Landau. SD stated that she had met JA four months prior and that SD had been working as a prostitute to make ends meet. SD stated that she gave all of the money she earned to JA and that "once you give your money to your daddy, it is the daddy's job to take care of you." Following JA making a call to SHANKLE, SD and JA traveled to Chicago. SHANKLE rented the rooms that JA and SD stayed in. SD stated that SHANKLE had a lot of girls working for him. SD stated that SHANKLE or his girls posted themselves on Backpage.com and at night, SHANKLE put his girls on the track. SHANKLE was always telling JA that he needed to put SD on the track and even though she didn't like it, she would do it for JA. SD didn't want to make things hard on JA so she would do what SHANKLE wanted her to do. SD never saw an exchange of money between SHANKLE and JA. SD stated that they must have done that behind closed doors. When times were slow, and SD wouldn't make any money on the track, she would do an in call so that JA could give SHANKLE the money he believed he was due. SD didn't know the money arrangement between JA and SHANKLE but knew that JA had to give SHANKLE a certain percentage of the money that SD made. SD stated that SHANKLE had a tattoo on his body of a lion face and lettering that says "Purepimpin."

8. I believe that SD is reliable because I have corroborated numerous parts of her statements, including, but not limited to the following:

   a. I know from my further investigation that JA was a pimp during the time period in which SD described;

   b. I have seen photos of SHANKLE'S conversion van and it is as SD described it;

   c. I have interviewed "CC," and she is the victim described as JV-1 in Count One of the superseding indictment of SHANKLE. JV-1 has admitted to prostituting for SHANKLE during the time period stated by SD.

   d. I know from Chicago Police Department officers that on October 23, 2010, SHANKLE and several of his prostituted females, including "CC," were observed staying at the Aloha Motel in Chicago and that on that date "CC" and several other females were arrested near the hotel for prostitution-related activities.

   e. I have reviewed a room folio from the Aloha Motel for October 23, 2010. It shows that a person with JA's first name rented a motel room that day and a person with the first name "Terrell" rented two motel rooms that day.

   f. I know from Chicago Police Department officers that on October 23, 2010, among other things, they seized from a room at the Aloha Motel, a Dell laptop computer.

   g. I know from my review of Chicago Police Department reports that officers obtained a search warrant for the Dell laptop computer and cameras, and, among other things, they observed on the laptop photographs of "CC" and other prostituted females as well as escort advertisements for these females on Backpage.com.

h. I know that in addition to the Dell laptop computer, Chicago Police officers also seized a camera and camcorder from that hotel room. I have watched a video from that camcorder in which JA and SHANKLE are seated in the front seat of a vehicle and both of them are talking and bragging about their pimping activities in Chicago.

9. Any photographs authorized will be taken by a male agent from the Federal Bureau of Investigation and will be taken in the presence of SHANKLE'S attorney, Anthony D. Cotton, unless the attorney declines. *See United States v. Nixon*, No. 15-CR-20020, 2015 WL 4430176 (E.D. Mich. July 20, 2015).

D. IDENTIFICATION OF THE ITEMS TO BE SEARCHED

10. To photograph the unclothed body of TERRELL M. SHANKLE, also known as "RELLY' and "KING RELLY," date of birth August XX, 1977, more specifically, to photograph a tattoo of a lion with the lettering "Purepimpin."

E. CONCLUSION

11. I submit that this Affidavit supports probably cause for a search warrant authorizing the search of the body of TERRELL M. SHANKLE in order to photograph a tattoo of a lion with the lettering "Purepimpin."